

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Ryan Cosgrove and Amanda Crout, :
:
Plaintiffs, :
:
v. :
:
OREGON CHAI, INC., :
:
Defendant. : Case No.: 19 Civ. 10686
:
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DECLARATION OF CHRIS RANKIN

I, Chris Rankin, declare under the penalty of perjury as follows:

1. I am a Commercial Finance Manager employed by the Kerry Group, which owns Oregon Chai, Inc. Based on my position, I have personal knowledge of the matters herein and if called upon to testify under oath, I could and would testify competently thereto. My business address is 3400 Millington Road, Beloit, Wisconsin.

2. I was asked to provide information about sales of certain Oregon Chai products that I understand are mentioned in the Second Amended Complaint in this lawsuit. The information described below comes directly from the accounting system used by Oregon Chai.

3. I have collected Oregon Chai's sales data from products delivered to New York from 2014 to 2019 for two of Oregon Chai Products: "VANILLA DRY CHAI 6/8 CT," which are cases containing six retail boxes of Oregon Chai Vanilla with eight packets in each box and "OC VANILLA - 4/8 CT," which are cases containing four retail boxes with eight packets in each box (together, the "Packets").

4. From 2014 to 2019, Oregon Chai had total revenue of \$187,483 from sales of the Packets with deliveries in New York

5. From 2014 to 2019, Oregon Chai sold a total of 81,356 retail boxes of the Packets into New York. It sold 9,096 retail boxes in 2014, 10,788 retail boxes in 2015, 12,132 retail boxes in 2016, 16,378 retail boxes in 2017, 15,622 retail boxes in 2018, and 17,340 retail boxes in 2019.

6. I also have collected Oregon Chai's sales data from products delivered to New York from 2014 to 2019 for two other Oregon Chai products: "OC VAN DRY – 6/10 OZ can," which are cases containing six retail 10 ounce tins of Oregon Chai Vanilla and "OC VANILLA - 4/10 OZ CAN," which are cases containing four retail 10 ounce tins (together, the "Tins").

7. From 2014 to 2019, Oregon Chai had total revenue of \$38,754 from sales of the Tins with deliveries in New York

8. From 2014 to 2019, Oregon Chai sold a total of 15,477 Tins into New York. It sold 1,284 Tins in 2014, 2,424 Tins in 2015, 2,568 Tins in 2016, 2,870 Tins in 2017, 1,937 retail boxes in 2018, and 4,394 Tins in 2019.

Dated: May 8, 2020

By: Chris Rankin
Chris Rankin